

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

A CERTIFICATION OF THE CARRIERS)
RECEIVING FEDERAL UNIVERSAL SERVICE) Administrative Case No. 381
HIGH-COST SUPPORT)

PETITION OF AT&T MOBILITY
(SAC 269905) FOR CONFIDENTIAL TREATMENT

AT&T Mobility¹ respectfully submits this Petition for Confidential Treatment of Attachments A-1 and A-2 to the Certification and Report (“Certification”) it filed in this docket on or about September 3, 2013.² This Petition is filed pursuant to KRS 61.878(1)(c)((1) and 807 KAR 5:001 Section 13, and is supported by the attached Affidavit of Chris Percy (“Percy Affidavit”).

While public records generally are open for inspection, *see* KRS §61.872(1), several exceptions exist. *See Id.* One such exception is that information “generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records,” is subject to inspection “only upon order of a court of competition jurisdiction” *See* KRS §61.878(1). As explained below, Attachments A-1 and A-2 to AT&T Mobility’s Certification are comprised entirely of

¹ New Cingular Wireless PCS, LLC d/b/a AT&T Mobility.

² As it has done in past years, AT&T Mobility is providing the original of its Summary of Potential Capital Projects for 2014 (“**Confidential Attachment A-1**”) and its Summary of ETC Expenditures for 2012 (“**Confidential Attachment A-2**”) as attachments to this original Petition for Confidential Treatment on yellow paper that is labeled “Proprietary Information” on each page. As all of the information in each of these Attachments is confidential and proprietary, the public versions of these attachments provide “The entire document is proprietary. There is no edited version.”

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**AFFIDAVIT OF CHRIS PERCY IN SUPPORT OF
PETITION OF AT&T MOBILITY (SAC 269905)
FOR CONFIDENTIAL TREATMENT**

Chris Percy being first duly sworn on oath, states as follows:

1. I currently serve as a Vice President / General Manager for AT&T Mobility Corporation, the manager for New Cingular Wireless PCS, LLC d/b/a AT&T Mobility (“AT&T Mobility” or “Company”). In this capacity, I have personal knowledge of the matters set forth in this affidavit and am authorized to make this affidavit on behalf of AT&T Mobility.
2. AT&T Mobility is requesting confidential treatment of spreadsheets describing the location of the Company’s cell sites, proposed service improvement projects and the estimated locations and costs associated with such improvements (**Confidential Attachments A-1 and A-2**).
3. All information in **Confidential Attachments A-1 and A-2** is confidential, proprietary, and/or trade secret information that would aid competitors of AT&T Mobility.
4. All information in **Confidential Attachments A-1 and A-2** addresses the Company’s network infrastructure, build out plans and operating costs. This information,

if disclosed, could cause substantial competitive harm to AT&T Mobility. This information is either not publicly available or not generally available in this format. It would be difficult (or impossible) for someone to discover this information from other sources. If this information were available to competitors in this format, they could use it to the competitive detriment of AT&T Mobility.

5. Wireless providers, like AT&T Mobility, operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

6. This information is protected internally by the Company as confidential, proprietary, and/or trade secret information.



Chris Percy, Vice President/General Manager

STATE OF TN)
)
COUNTY OF WILLIAMSON)

Subscribed and sworn to before me by Chris Percy as Vice President / General Manager of AT&T Mobility Corporation, the manager for New Cingular Wireless PCS, LLC this 26TH day of August 2013.



Notary Public

My commission expires: MAY 3, 2016

